

EXHIBIT A

1 UNITED STATES DISTRICT COURT
2 SOUTHERN DISTRICT OF INDIANA
3 INDIANAPOLIS DIVISION
4 Case Number 1:23-CV-00099-SEB-MG

5 JOHN THOMSON,)
6)
7 Plaintiff,)
8)
9 -vs-)
10)
11 ROCHE DIAGNOSTICS CORPORATION,)
12)
13 Defendant.)
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16)
17)

18 REMOTE DEPOSITION OF JOHN THOMSON
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The remote deposition upon oral examination of JOHN THOMSON, a witness remotely sworn by me, Tara Gandel Hudson, RPR, CRR, a Notary Public in and for the County of Hancock, State of Indiana, taken on behalf of the Defendant, with the witness located in Roswell, Fulton County, Georgia, on the 8th day of September, 2023, scheduled to commence at 9:30 a.m., pursuant to the Federal Rules of Civil Procedure with written notice as to the time and place thereof.

1 Q Finally, if you don't understand my question, if
2 you need me to explain something, repeat
3 something, just speak up. Okay?

4 A Okay.

5 Q So let me ask you, how's your health today?

6 A Very good.

7 Q Okay. And are you on any prescription
8 medications that could impact your ability to
9 testify truthfully?

10 A No.

11 Q Okay. Let me ask you, just so I understand it
12 to take some of the issues -- what remedies are
13 you seeking from this lawsuit?

14 A To be paid for the KSOs that were never
15 developed.

16 Q Okay. And that's it? As to the compensation,
17 aside from maybe your attorneys would make
18 claims for attorney fees or something like that,
19 but from you, your damages specifically, is the
20 KSO from 2018 to 2022?

21 A Correct.

22 Q And --

23 A For me personally, yes.

24 Q Just so we're clear, you're not alleging or
25 seeking any damages for pain and suffering or

1 emotional harm or anything like that?

2 A That is correct.

3 Q Okay.

4 MR. CAMPBELL: Anna, is all that correct --
5 I want to make sure I don't have to go into some
6 of the other issues.

7 MS. CONKLIN: That's correct. The wage
8 claim statute damages, but no pain and suffering
9 or emotional damages. That's correct.

10 MR. CAMPBELL: Okay. I want to make sure
11 so I didn't have to go through those points as
12 to it.

13 BY MR. CAMPBELL:

14 Q Mr. Thomson, let me just ask you -- and I guess
15 just finally, you retired from your employment
16 with Roche; right?

17 A January 16 of this year. Correct.

18 Q And that was a voluntary decision?

19 A Yes.

20 Q You're not in this lawsuit, you're not alleging
21 that your retirement was in any way unlawful or
22 forced or anything like that?

23 A That is correct.

24 Q This is from 2018 to 2022 the KSO, as we call it
25 under the incentive compensation plan; is that

1 Q Okay. So let me move onto some of the other
2 points as to this. Let me ask you about the
3 incentive compensation plan. We're going to go
4 through each of the years and look at it.

5 Have you determined an amount that you are
6 seeking under those years?

7 A We really haven't -- I would say no. Not
8 explicitly. Although -- so when you say for all
9 the years, let me make sure.

10 Q All or each year. Either one.

11 A Anna and I have talked about -- floated numbers.

12 Q I don't want to know what Anna did -- just to be
13 clear, if you have to say, "I talked to Anna
14 about this or did that," that's something that
15 I'm not entitled to get. I'm just saying to
16 you, if you have a number as to it, "yes" or
17 "no" as to it.

18 A No.

19 Q I don't want to know that you told Anna, Hey, it
20 should be this or that.

21 A No.

22 Q You don't know an amount for even like a year or
23 overall, you don't know either one?

24 A I would say the maximum payout would be the
25 maximum amount. Yes. So if I understand your

1 question, yes.

2 Q So it's your position in this lawsuit that you
3 were performing to the level that you should
4 have gotten a maximum payout from 2018 to 2022?

5 A Well, so I think I know in listening to the
6 depositions of Jason Fowler and Ron DiNizo, if
7 we had KSOs, I do believe I would have. But we
8 never had KSOs. So everything was completely
9 subjective. So yes, I do. But we never had
10 KSOs.

11 Q Okay, okay. Let's go through a little bit. How
12 long were you employed by Roche?

13 A 43 and a half years, my entire professional
14 life.

15 Q What was your final position that you held?

16 A I think they call it a corporate accountant
17 director for GPOs.

18 Q Say that again so the record is clear.

19 A Corporate account director, group purchasing
20 organizations.

21 Q How long did you hold that position?

22 A Well, I've been involved with group purchasing
23 organizations for approximately 15 years, but
24 there's several of them, and I have been
25 involved in different ones. This current

1 position has been longer -- I'll be honest, I
2 don't recall. It's been prior to 2018.

3 Q Okay. Any idea whether it was five years prior,
4 one year? Any idea about that?

5 A It depends on how -- let's see if I understand
6 the question. Again, I focused at least the
7 last five or six years on Vizient which is the
8 largest national GPO.

9 Prior to that, I did them all by myself
10 during a certain time period. I also worked
11 with Premier, the second largest GPO. I worked
12 with Health Trust, the third largest over the
13 course of the last 15 years. So Vizient, I
14 would estimate to be between five and seven
15 years.

16 Q Let me ask it this way. We're going to be
17 talking about the incentive compensation plan
18 during this --

19 A Yeah.

20 Q -- deposition.

21 I know you know where I'm going. Just give
22 it a second for me to complete the question and
23 then you answer.

24 So how long -- how many years prior to your
25 retirement were you eligible to earn additional

1 compensation beyond your salary under the
2 incentive compensation plan? Are we talking 15
3 years, 20 years? How many years were you
4 eligible under that plan?

5 A So Roche defines it, if I understand your
6 question correctly, how long have I been
7 eligible for some type of incentive pay for -- a
8 sales position was called incentive comp. For
9 nonsales positions such as marketing positions
10 that I've had, it's called an annual bonus.

11 So are you looking for how long I've been
12 eligible for either one?

13 Q Why don't you start there.

14 A 35 years, probably. Estimate.

15 Q How long were you under the sales side of it?

16 A Since 2017, I believe. No, I'm sorry. I'm
17 sorry. Correct that. 1997.

18 Q Okay. So over 25 years, you were under a -- you
19 were a sales employee governed by an incentive
20 compensation plan?

21 A Correct.

22 Q And just so the record is clear, the incentive
23 compensation plan in simple terms, you were paid
24 a salary; right?

25 A Correct.

1 Q And the incentive compensation plan made you
2 eligible for group and individual incentives
3 that paid you beyond your base salary?

4 A Yes.

5 Q When we talk about "group," it would be looking
6 at your department or area. There's some group
7 of employees beyond you that would be purely
8 objective; right?

9 A Yes. For things such as revenue, for profit.
10 Yes.

11 Q Okay.

12 A Many of us had those metrics, yeah.

13 Q That would be you and your team, so to say, I'll
14 use for this deposition, that's entirely
15 objective, Did we meet our sales goal? Did we
16 meet our revenue? Whatever those are. And you
17 and the rest of the team members would be paid
18 out under that group incentive; right?

19 A Correct.

20 Q The KSO, what does "KSO" mean? What's that an
21 acronym for?

22 A Key sales objectives.

23 Q How long did you have --

24 And the key sales objectives are more
25 individualized; right?

1 A Yes.

2 Q The key sales objectives, as we heard, are very
3 subjective versus, Hey, you meet a revenue goal
4 of X. It's more subjective as to, Are you doing
5 your job and going beyond it; right?

6 A Would not call them subjective. If you look at
7 the incentive compensation plan, it's supposed
8 to be specific and measurable for the
9 individual.

10 Q Okay. So you think it was objective and
11 specific and measurable, is your position?

12 A Yes. That's how they are designed. Yes.

13 Q Okay. I just want to have your testimony.

14 So, Mr. Thomson, as to the KSO, how long
15 were you eligible for a KSO? Was that from that
16 1997 that you had that portion of compensation
17 as part of your incentive compensation plan?

18 A I don't know if we called them KSOs back then or
19 not. They used to be called MBOs. They are
20 some form of measurable and specific metrics
21 that you were to achieve.

22 Q Let's group them this way. Since 1997, you had
23 in addition to your salary, you were a sales
24 employee at Roche, and you had in addition to
25 salary, you could earn additional compensation

1 through group incentives; right?

2 A Define "group" for me. Maybe I'm not
3 understanding that.

4 Q We'll certainly look at the plan and your
5 compensation, but Roche would look at whatever
6 your department group -- the sales objectives
7 that we talked about; right? You talked about
8 revenue or sales; right? It wasn't just you?
9 There was some group or department; right?

10 A That is correct.

11 Q Okay. I'm not trying to be difficult. I'm just
12 trying to narrow things down.

13 A I just want to be clear. Yeah.

14 Q To be clear, so the first aspect since 1997, you
15 were eligible under the incentive compensation
16 plan that was applicable to you for some
17 group-wide incentive; right?

18 A Yes. Depends how you define "group," but yes,
19 I've been in corporate accounts since 1998. So
20 yes. If that's the group you're referring to,
21 yes.

22 Q Okay. Let's make it simple for you so we don't
23 have to have a dispute later on.

24 The group would be your corporate accounts;
25 is that what you're saying? They would look at

1 the corporate accounts, employees, to see if you
2 met the overall revenue or sales goals or
3 increase from the prior year; right?

4 A Yes.

5 Q So since 1997, you said you moved in in 1998
6 into the role. For about 25 years, close to,
7 before you retired, you were eligible for and
8 received, I'm assuming most years, that group
9 incentive under the incentive compensation plan;
10 right?

11 A Yeah, just to be clear. So in 1997, I moved
12 down to Atlanta for a job not within corporate
13 accounts. I was then promoted in 1998 to a
14 corporate accounts position, but it was not for
15 group purchasing organizations.

16 Q Okay. Mr. Thomson, we might be here for eight
17 hours if we get onto this. I'm just trying to
18 say for over 20 years, you were in a position
19 eligible for a group incentive under the
20 incentive compensation plan; right?

21 A Yes.

22 Q Okay. I'm really -- I'm just trying to do it.
23 If we're arguing about '97, '98, we will be here
24 forever. I appreciate you being specific, but
25 we're being very specific on issues that really

1 aren't that specific.

2 Let's talk about the other portion of the
3 incentive compensation plan. For over 20 years,
4 the last 20 years of your employment, they
5 weren't always called KSO, but you were eligible
6 for what we're saying in this deposition for
7 some individual incentive under the incentive
8 compensation plan; right?

9 A It's what I recall. Again, I haven't gone back
10 and reviewed every incentive comp plan since
11 1997.

12 Q Understood. But you do recall that your
13 compensation as a sales employee did include
14 some type of both group incentive and individual
15 incentive; right?

16 A That is correct. Yes.

17 Q And as to those incentives, you -- at Roche,
18 let's talk a little bit about Roche as to it.
19 Long-term employee, 43 years. I'm assuming you
20 were very familiar with all of the various
21 complaint procedures that you had available to
22 you at Roche; right?

23 A I'll say I wasn't because I never really had any
24 complaints.

25 Q Okay.

1 A Until Jason Fowler. Yeah.

2 Q Let's talk about it. Certainly, if in 2010 you
3 thought somebody was giving you discipline that
4 wasn't appropriate, you knew how to figure out
5 who to go and complain to; right?

6 A I would go to my manager, yes. It was typically
7 about miscalculations.

8 Q If your manager didn't satisfy -- I'm --

9 Mr. Thomson, I'm trying to say if you
10 thought your manager -- let's say you thought
11 your manager in 2010 was discriminating against
12 you based on your age and was holding you to
13 different standards than your co-workers, you
14 could go to human resources; right?

15 A Yeah. I'm sure I could have, yes.

16 Q You, as a long-term employee, could find the
17 various complaint procedures available to you at
18 Roche; right?

19 A I'm sure I could if I dug deep enough, yes.

20 Q Well, dug deep enough. You had access to all
21 the policies and procedures and manuals on your
22 Roche computer; right?

23 A Correct.

24 Q Okay.

25 A That talk about the calculations of KSOs or the

1 A No. I'm going to retire someday. I didn't have
2 a date set, no.

3 Q You're asking for payout. I take it the payout
4 meant you were leaving. You were retiring, and
5 you wanted a payout.

6 A Yes, I would -- I'm sorry to interrupt you.

7 Yes. I would leave because it was my
8 belief that you didn't need four GPO people.
9 You needed three.

10 It would be in the interest of the company
11 to move that into a more revenue-producing
12 position.

13 Q Well, my question is -- well, let's take a step
14 back. When did you announce your retirement?

15 A August 31.

16 Q And I can't imagine you made the decision on
17 August 30. When did you make the decision that
18 you were going to be retiring at the end of
19 2022?

20 A It's really the beginning of 2023.

21 However, I don't remember exactly. All I
22 know is when I talked to Ron, I had no firm date
23 in mind. So I was going to give as much notice
24 as possible. That's why I gave, what, four
25 months' notice that I was retiring. It was

1 sometime in the summer. I said, Okay, I'm ready
2 to go.

3 A lot had to do with a big contract. I was
4 negotiating contracts with Vizient that were
5 worth over \$2 billion over the five-year term of
6 these agreements. So I wanted to complete those
7 before I retired. And two out of three I did
8 complete. The third one was postponed. I
9 wanted to leave Vizient in very good shape.

10 Q When you went in to talk to Ron in March of
11 2022, you went in with a proposal that Roche
12 would pay you additional compensation to have
13 you retire and leave with your retirement
14 benefits; right?

15 A A severance package, correct.

16 Q You didn't go in and say, Hey, 2021, I should
17 have earned this. You went in and said, I want
18 an additional sweetener to my retirement; right?

19 A Let me think about that. So, I mean, again, the
20 whole purpose of the call was to communicate
21 that for five years we didn't have specific and
22 measurable KSOs. Remember that according to the
23 policy, that Jason -- the way it works is, the
24 objectives come down from senior management.
25 They filter all the way down. Jason's job was

1 you proceeded to utilize all of your PTO; right?
2 You didn't work much over your final six months
3 of employment; right?

4 A That is not an accurate statement.

5 Q What is accurate? How many PTO days did you
6 take in 2022?

7 A Let me tell you what happened. So on August --

8 Q No. My question to you, John, is -- first of
9 all -- here's what I would say. I'm going to
10 ask you the questions. You're going to answer.
11 If you want to then say, I've answered your
12 question, and I want to say more, you're free to
13 say whatever you would like. Okay? But right
14 now, I want to know how many PTO days, vacation
15 days did you take in 2022?

16 A I don't have that information. I can give you
17 an educated guess.

18 Q Okay. Why don't you give us that.

19 A So I believe I had over 60 days accrued plus
20 what I would earn until January. I initially
21 told Jason that I was going to do this. He told
22 me HR would never agree to it. He then told me
23 he was moving onto a different job. So I didn't
24 want to leave Ron in a bad situation, so I
25 took -- if I had to guess, between 20 and 25 of

1 those days between September and January 16.

2 Ten of those days were for a vacation to
3 Spain and Italy.

4 Q So we took the vacation for the year.

5 Then let's just talk --

6 So your issue that you took to Ron was an
7 overall issue from 2018 to 2021, I guess, or
8 even 2022, and saying, I'll leave if you pay --
9 do you know what your demand was? What did you
10 ask Ron for as the sweetener?

11 A Standard severance package.

12 Q So you just wanted a standard severance package,
13 meaning, Treat me as if you're eliminating my
14 position, is what you're saying?

15 A That's exactly right.

16 Q So that's why you told me that you were raising
17 with Ron, You don't need this many people in
18 corporate accounts. Why don't you eliminate my
19 position and give me a severance?

20 A You don't need this many people in corporate
21 accounts for GPOs.

22 Q Got it.

23 A Don't move that position out of corporate
24 accounts. Just redirect it, reassign it.

25 Q You're saying, Hey, why don't we do a win/win?

1 A Yes.

2 Q You never went to human resources about the
3 incentive compensation plan from 2000 to 2020?

4 A Correct.

5 Q And until the -- I mean, there was never
6 anything beyond that. We talked about
7 everything as to your complaints internally to
8 Roche under the incentive compensation plan.
9 You have told me the number of years that you
10 can recall that you raised it with your direct
11 manager. You raised it one time beyond that;
12 right? We have talked about the one.

13 A That is correct.

14 MR. CAMPBELL: Why don't we take a short
15 break. Why don't we come back at 20 after.
16 Does that work for everybody? And we'll begin
17 with looking at some of your plans. Okay?

18 THE WITNESS: Okay. Thank you.

19 (A recess was taken between 10:09 a.m. and
20 10:20 a.m.)

21 BY MR. CAMPBELL:

22 Q So, Mr. Thomson, before we go to the next line
23 of questions, is there anything that you need to
24 supplement before I go on from your first period
25 of answering questions?

1 A No.

2 Q So let me ask you some -- I'm going to show you
3 some exhibits now. We're going to go through
4 some of the years on this. I'm going to, first
5 of all, take you to what's been marked as
6 Exhibit 2.

7 (Deposition Exhibit 2 was presented for
8 identification.)

9 Q I'm going to show you one of the attachments to
10 your complaint in this matter.

11 Can you see my screen, Mr. Thomson?

12 A Yes, I can.

13 Q I'm going to scroll through this just to verify
14 that you see the four pages.

15 What is this document?

16 A This is the 2018 Incentive Compensation Plan for
17 Group Purchasing Organizations.

18 Q Okay. When did you typically receive this
19 document?

20 A Typically in January.

21 Q Okay. January --

22 A Yeah.

23 Q I'm sorry. January of 2018?

24 A Correct.

25 Q And you said you had to actually sign off on it?

1 A Yes. Through the portal. The learning portal
2 at Roche.

3 Q You get it through the learning portal. After
4 you receive this through the learning portal,
5 you would then have communications as a team
6 with your manager; right?

7 A Well, I just want to be clear about this. So
8 what we did with the portal was say that we read
9 it, acknowledged it. You would get it from our
10 manager.

11 Q Okay. Then I believe you've already testified,
12 Mr. Thomson, I'm not trying to be difficult, but
13 I believe you testified that then your manager
14 would have communications with you and the rest
15 of the group purchasing organizations team about
16 it?

17 A Correct.

18 Q Okay. And when did those communications
19 typically take place? January, February?

20 A It could be before. Acknowledge that we read
21 it, or it could happen afterwards.

22 Q When you got your midyear payout, did you meet
23 with your manager?

24 A Well, when you say meet with them -- so we
25 would -- we typically would get the check,

1 figure out how we got paid. It wasn't always
2 presented to us.

3 Then I would reach out to understand why it
4 was paid out in such a way.

5 Q Okay. So you get -- you would receive your
6 compensation midyear, and for 2018, was
7 Mr. Fowler your manager?

8 A Yes. The entire year.

9 Q So 2018, you received your midyear compensation.
10 And based on your practice at Roche, you would
11 then reach out to Mr. Fowler to say, Why did I
12 get paid X amount?

13 A Have you scanned to look at the KSOs? It has
14 changed over time when things were paid out. I
15 just want to make sure I'm answering it
16 correctly. Semiannual; right? So semiannual on
17 KSOs. So yes, we would have received a check
18 semiannual.

19 Q Okay. You would check with Mr. Fowler in 2018,
20 2019, 2020, 2021, and 2022, A, You paid out
21 blank amount. Why?

22 A Yes.

23 Q Did you follow that same procedure at the annual
24 payout to check with Mr. Fowler in 2018, '19,
25 '20, '21, and '22, to review what you were paid

1 out?

2 A Yes.

3 Q Okay. So you received this. I take it that if
4 you received this, certainly if you had
5 questions about, for example, KSO or anything
6 like that, you could go to Mr. Fowler or to
7 Mr. DiNizo or whoever his manager is to ask
8 questions about it; right?

9 A Just to be specific, Ron DiNizo's manager is the
10 CEO of North America. I probably wouldn't go to
11 him.

12 Q I was saying Mr. Fowler's manager you could go
13 to; right?

14 A That is correct.

15 Q Or you could go to HR if you wanted to say, Hey,
16 I've got questions about my incentive
17 compensation plan; right?

18 A Correct.

19 Q I assume you and your co-workers in the group
20 sales organization would be speaking during that
21 time frame as well to say, Hey, what do you
22 think about it, and those types of things;
23 right?

24 A Yes.

25 Q And I take it that the plans, they certainly

1 changed somewhat each year, but in general,
2 these plans weren't -- I guess they didn't
3 reinvent the wheel every year; right? They were
4 pretty consistent throughout the course of your
5 20 years under the incentive compensation plan?

6 A I would not say "consistent." If you look at
7 the 2018, 80 percent of the payout was based on
8 KSOs.

9 Q Okay.

10 A If you look at future years, I think as low as
11 maybe 30 percent were based on KSOs. To me,
12 that's pretty substantial.

13 Q From 2018 to 2022, you're saying the percentage
14 of the KSO payout went down?

15 A Well, it changed. I don't have it all committed
16 to memory, but they change, which I'm sure we
17 will see. If you would, it's 80 percent for
18 2018.

19 Q And I guess I would say that is a change, but my
20 question to you would be although the
21 percentages might be changed and the revenue
22 projections might be changed as to the group
23 points and those types of things, obviously,
24 they are increasing or decreasing based on the
25 market and based on Roche's sales. But in

1 general, the criteria for you to earn your
2 compensation weren't drastically changing over
3 the course of those 20 years that you were on
4 the incentive compensation plan; right?

5 A Again, it depends how you define "drastically,"
6 but in general, I agree with you.

7 Q Okay. So let me take you now to the 2018 -- I'm
8 going to take you now to Deposition Exhibit 1.

9 (Deposition Exhibit 1 was presented for
10 identification.)

11 Q Can you see my screen?

12 A Yes.

13 Q Do you recognize this document, this
14 31-page document?

15 A Yes.

16 Q I'm happy -- do you want me to scroll through
17 all the pages?

18 A Depends on what you're going to ask. I don't
19 have it committed to memory. No.

20 Q Are you familiar with RDC-107?

21 A Yes.

22 Q And this is the description for this year, this
23 is what we're looking at, just so we're clear,
24 it was effective February 7, 2018; right?

25 A Yes.

1 Q And this is the Sales and Service Incentive
2 Compensation Plan Policy for that time period;
3 right?

4 A Yes.

5 Q So this is what that Exhibit 2 is based off of
6 that I just showed you; right?

7 A Yes.

8 Q Okay. If you wanted to take a look at the
9 actual plan policy, were you looking at RDC-107
10 every year or just some years?

11 A I would say every year because it's changed
12 periodically. Probably changed four or five
13 times, yeah.

14 Q How did it -- I guess I would say how did you
15 have access to it as a Roche employee? Where
16 did you get access to RDC-107?

17 A Typically, it would be part of the learning, the
18 learning portal. You would get an email saying,
19 You need to go out and read and understand this,
20 is how we would get access to it.

21 Q This is every year that you were under the
22 incentive compensation plan, you would -- on the
23 learning portal, you would get notice of, Here's
24 your plan for the group sales, as well as here's
25 RDC-107 that you should review and acknowledge

1 receipt of?

2 A No. Only when they changed.

3 Q Only when they changed. Okay.

4 So if we see each year from 2018 to 2022
5 that RDC-107 changed, you would have gotten it
6 on the learning portal each year?

7 A Yes.

8 Q So let's look at this one. I just want to take
9 you to Section 4 on this document.

10 Section 4, do you see that on my screen?

11 A Yes.

12 Q And Section 4, Incentive Plan Payment Review.
13 Did I read that right?

14 A Yes.

15 Q This one states, and I'll read it just for the
16 record. Then I'll ask you some questions.

17 Let me read it first, and I'll ask you some
18 questions.

19 "Employees on ICP" --

20 That's this incentive compensation plan;
21 right?

22 A Yes.

23 Q -- "are responsible for reviewing and confirming
24 the accuracy of their commission and bonus
25 payments."

1 A That's not -- go ahead.

2 MS. CONKLIN: Objection. Misstates the
3 record.

4 Go ahead, John.

5 A Yes, I did.

6 BY MR. CAMPBELL:

7 Q Well, I guess, first of all, I asked you about
8 your complaints, okay, and what you did. You
9 only met with Jason Fowler's manager on one
10 occasion. That was 2022; right?

11 A Correct.

12 Q Are you saying you submitted this incentive plan
13 payment review, this written discrepancy every
14 year from 2018 to 2022?

15 A Only 2018 because of, as this says, there was a
16 mistake in the calculation of the payout.

17 Q I'm not -- let me be clear with you. Okay? I'm
18 not looking -- if you want to at the end of your
19 statement explain further and give your argument
20 for it, you're welcome to do that. Okay? I
21 don't have any problem with you doing that. But
22 I'd like you to answer my questions, okay,
23 first. Because if you don't answer my
24 questions, I just have to ask it two or three or
25 four times to get it, and then we go back and

1 forth. Okay? Let me ask you first.

2 So from what you just said, 2019, 2020,
3 2021, and 2022, you did not submit this written
4 review; right?

5 I don't think you came through. I didn't
6 hear you.

7 A Correct. Can you hear me?

8 Q Now, I can hear you. Okay. In 2018, you did,
9 and that was due to what? You said there was a
10 calculation error?

11 A Yes.

12 Q Was that corrected?

13 A Yes.

14 Q So you didn't in 2018 say, Hey, I don't think I
15 was paid out enough on the KSO, in writing?

16 A In writing, no.

17 Q You didn't do that for 2019, 2020, 2021, or
18 2022; correct?

19 A Well, I would -- I don't believe that's an
20 accurate statement either, as we discussed.

21 Well, I'll leave it there.

22 Q I didn't ask you whether it was accurate or not.
23 I asked you for an answer. I think you've
24 already answered it, but please confirm. You
25 didn't submit this written objection under the

1 more than the others.

2 Q So you think that you achieved more than your
3 three co-workers in 2018?

4 A Yes.

5 Q Now, you had the opportunity when you got paid
6 your ICO payments, semiannual and annual, you
7 sat down with Mr. Fowler to discuss it on both
8 of those occasions; right?

9 A Yes.

10 Q You had the opportunity to say to him, This is
11 how well I did. I think I performed better than
12 my co-workers. Right?

13 A I would say I didn't really position as better
14 than my co-workers. This is what I
15 accomplished. Because what my fellow co-workers
16 make is really none of my concern; right? My
17 concern is how did I do against KSOs that
18 weren't developed.

19 Q I guess, well, first of all, if the KSOs,
20 Mr. Thomson, weren't developed, and you didn't
21 know what to do, is it your testimony -- let's
22 be clear. You're a 43-year employee, been a
23 sales employee for every 20 years. Is it your
24 testimony that you had no idea what it took in
25 order to be a good employee at Roche and to earn

1 your KSO? Is that your testimony?

2 A My testimony is I knew what I had to do to be
3 successful. There's nothing to measure me
4 against.

5 Q But my question is, you certainly knew, after 20
6 years as a salesperson, and if you claimed to
7 have known enough how to reconfigure this
8 department to be more profitable, you certainly
9 understood what it took for you to be excelling
10 in your position; right?

11 A Yes.

12 Q It wasn't a mystery to you. You weren't a new
13 employee to sales and needed to be sat down and
14 told, This is what you should be doing every
15 day. You knew it; right? Whether Mr. Fowler
16 was your manager, or if Mr. Fowler had been
17 replaced the next day, you knew what your job
18 was, and you knew what it took to be a good
19 Roche employee in your department; right?

20 A Because we had no KSOs, it was difficult to read
21 Jason's mind to know what he felt was important.

22 Q Certainly, you had every opportunity to go to
23 human resources or to Mr. Fowler's manager or to
24 anyone else at Roche to say, Look, I believe
25 that after 20 years, I don't know enough to be

1 able to determine what it takes to be a good
2 Roche employee. I need to have more directive
3 for that, and I'm complaining about it. Right?
4 You knew how to do that?

5 A No. I'm not characterizing my words -- maybe I
6 could try to explain it again.

7 I know what it takes to be a good employee.
8 I do. I've been very successful for 43 1/2
9 years.

10 The key sales objectives change over the
11 years. They are supposed to come from top down.
12 That never happened.

13 Q Okay.

14 A What Jason thought was what I should be doing
15 may not align 100 percent with what I thought
16 was important. I knew how to be a good
17 employee.

18 Q Okay. I guess I would say this. We're sitting
19 here, five years after 2018, with you claiming
20 without any proof; right? You haven't reviewed
21 Ms. Boik's sales efforts, performance reviews,
22 or anything for 2018; right?

23 A Correct.

24 Q You don't have any basis, aside from your own
25 subjective opinion, that you were performing

1 January 30, 2019; right?

2 A That's not accurate, no.

3 Q When did you get your payout?

4 A It was typically in February. February 15.

5 Q That's even more to my point. February 15, you
6 get your payout, you go talk to Mr. Fowler. By
7 that time, you had already received the
8 incentive comp plan and the RDC-107 for the next
9 year; right?

10 A Yes.

11 Q So if we're sitting in February 2019, and you
12 sit down with Mr. Fowler, and he tells you --
13 you were close to a hundred percent in every
14 year aside from 2019; right?

15 A Yes.

16 Q He told what you percentage you were paid out;
17 right?

18 A After I questioned him about, yes. I can
19 calculate it myself based on my check.

20 Q So whether you had a question and calculate
21 it -- you knew whether you were at 100 percent,
22 102 percent, or some other number; right?

23 A Yes.

24 Q And so if you were paid out 100 percent and felt
25 you should have been paid more, you had every

1 performance review to human resources, you could
2 have taken it to Mr. Fowler's manager. If you
3 felt it was wrong, you had a variety of ways to
4 challenge it; right?

5 A I did.

6 Q And you didn't?

7 A For what I considered very good reasons.

8 Q What's a good reason that you're filing a
9 lawsuit four or five years after the fact? You
10 don't raise anything then, but now you're saying
11 it was a wrong evaluation. That's what you're
12 saying; right?

13 A I am.

14 Q Don't you think that in order to really
15 determine whether that's a proper evaluation or
16 not, that you have to timely say, Hey, I don't
17 agree with this, and HR, can you review it?

18 A So HR was supposed to sign off on the KSOs;
19 right? They didn't do it. Ron DiNizo was
20 supposed to sign off on the KSOs, didn't do it.
21 Jason Fowler never developed them. It was my
22 opinion I couldn't win because they are all in
23 on it.

24 Q My question to you was, on the performance
25 evaluation that you said you disagreed with that

1 Mr. Fowler gave you for 2019, you should have
2 then went to human resources to say, I disagree
3 with this. My performance was much better than
4 what Mr. Fowler believes. Right?

5 A Could have. Yes.

6 Q Well, I mean, you think that that would be a
7 more appropriate forum than to, five years
8 later, raise a lawsuit and subjectively claim
9 that somehow Mr. Fowler was wrong?

10 A Disagree with that statement.

11 Q Okay. So the payouts on this year, again, it
12 looks like your co-workers were paid out close
13 to a hundred percent, and I believe you were
14 paid out a little under 90 percent; right?

15 A I believe that to be correct. Yes.

16 Q You knew your payout percentage when this was
17 presented to you in February of 2020; correct?

18 A I knew it when I received my check.
19 February 15.

20 Q Then you went and met with Mr. Fowler to discuss
21 why you received that percentage payout?

22 A We had that discussion before that time. But
23 yes.

24 Q And if you disagreed with that, you felt that
25 your payout should have been the maximum, you

1 certainly could have went to human resources or
2 Jason Fowler's supervisor to raise that
3 complaint; right?

4 And you did not?

5 A Correct.

6 Q Let me take you to Exhibit 13.

7 (Deposition Exhibit 13 was presented for
8 identification.)

9 Q Let's look at Exhibit 13. Then Exhibit 13 is
10 the payout for our 2020 ICP; correct?

11 A There it is. Yes.

12 Q Let's look at --

13 Was this your team in 2020?

14 A Yes, it was.

15 Q Okay. Let's look at the KSO payouts. If we
16 look here, the KSO payouts were you were paid
17 identical aside from one of your co-workers, and
18 it looks like that co-worker was Catherine Boik;
19 correct?

20 A Correct.

21 Q And you believe that you outperformed your three
22 other co-workers in 2020?

23 A I really don't have knowledge enough to answer
24 that question.

25 Q And Mr. Fowler told you at the end, the

1 in 2020; right?

2 A Completely subjective, yes.

3 Q And if you disagreed with his subjective
4 perception of your performance, you could have
5 went to the human resources department; correct?

6 A Could have, yes.

7 Q Could have went to Ron and said, Ron, I think I
8 was outperforming or I could have outperformed
9 had I gotten written KSO prior to just having
10 verbal discussions with Mr. Fowler; right?

11 A Absolutely.

12 Q Okay. And you didn't do that in 2021; right?

13 A Yes.

14 Q Okay. Now let's go to -- let me stop my share.
15 Let's go to our next exhibit, Exhibit 14.

16 (Deposition Exhibit 14 was presented for
17 identification.)

18 Q I'm going to take you to Exhibit 14. First of
19 all, for the 2020 payout, was that your team?

20 A This looks like 2021.

21 Q That's right. The 2021 ICP?

22 A Correct.

23 Q 2021 ICP, it looks like for KSO, you were paid
24 out \$30,000 in 2021?

25 A Correct.

1 Q And what percentage was that?

2 A I believe it was 100 percent.

3 Q Did you -- aside from 2019, did you receive a
4 hundred percent each of the other years?

5 A I think 2018 was just a hair under and 2022 was
6 just a hair over. I believe the other ones were
7 100 percent.

8 Q So a hundred percent, and as to it -- okay. On
9 this year, it looks like Whitney Johnson and
10 Sonal Patel both earned less than you on the
11 KSO; correct?

12 A There's a reason for that, but yes. Whitney
13 Johnson left her position during the year, and
14 Sonal took over her position. So they were paid
15 based on time in position.

16 Q Their total for that position is less than
17 yours; right?

18 A The position -- the territory was open for quite
19 a bit of the year. Yes.

20 Q Then we get into Richard and Catherine, and they
21 both earned more than you in 2021; right?

22 A Yes.

23 Q How was your performance in comparison to
24 Richard and Catherine in 2021?

25 A I really don't have enough knowledge to comment.

1 Q And this is the year that you met with
2 Mr. Fowler. You talked to Mr. Fowler in
3 February 2022. He gave you his reasoning, and
4 you said in, what, March is when you went to
5 Ron?

6 A Yes. I believe it was March, yes. That we had
7 our Zoom call.

8 Q Then March is when you said, I'd like you to --
9 I think that this department would be better
10 suited if you give me a severance and move my
11 role to a different -- different area, I guess,
12 is what you were saying?

13 A Yes.

14 Q Okay. So now I have to say to you that if they
15 had just had somebody leave -- Whitney had just
16 left the department, and they replaced Whitney
17 with Sonal; right? During 2021?

18 A Yes.

19 Q It would seem that your reasoning was contrary
20 to Ron and Jason's view of the department;
21 right?

22 A I don't agree with that statement.

23 Q You don't agree. Don't you think that if they
24 believed you were right or your reasoning was
25 right, that when Whitney Johnson left, they

1 in these positions, and have them do more than
2 what we had been -- more than what our
3 accountabilities back then included.

4 Q Okay. Let's go to our final exhibit.
5 Exhibit 15.

6 (Deposition Exhibit 15 was presented for
7 identification.)

8 Q So for the 2022 ICP, were these your co-workers?

9 A Yes.

10 Q And the earnings -- let me see, it's a little
11 different here. What was your payout under the
12 KSO in 2022, the ICP 2022?

13 A I believe it was 103 percent.

14 Q 103 percent. Okay. Do you know where your
15 co-workers fell?

16 A I know Rick Feid was at 114 percent.

17 Q Do you know where Sonal and Catherine were?

18 A No. But if you -- based on Catherine's payout,
19 she was greater than 115 percent. Because I
20 believe she --

21 Q I'm sorry.

22 What column are you looking at?

23 A Could you keep going? Is there more?

24 Q Year-to-date payout?

25 A No. This may not have been year end. Is there

1 over if they excelled or under a hundred percent
2 if they had a poor year? Did you hear that
3 testimony?

4 A I would agree with that, that I did hear it.

5 Q You heard it.

6 Certainly -- let me ask you this. When you
7 were talking to Jason, did he explain to you
8 that mindset of you were earning around a
9 hundred percent and you're doing your job. If
10 you want to earn higher, this is what you have
11 to do in order to earn higher?

12 A Disagree with that. That's why he didn't
13 develop KSOs. If they had developed KSOs, I
14 would agree with that statement. Never had
15 those discussions.

16 Q I guess I would say, sir, the time to say, I
17 don't have a KSO when I want to have it, would
18 presumably be January, February, March, April,
19 May of the year of the compensation plan; right?

20 A Absolutely.

21 Q And that's the time when you go to human
22 resources or you go to Ron, and you say, Hey, I
23 would like Jason to give me more specific KSO
24 because even though I've been here, I don't know
25 what Jason might be looking at to be positive,

1 A No. I disagree with that.

2 Q What are you saying? I don't understand.

3 A He had no reason to be upset with me in 2018 for
4 a calculation error that was easily resolved.

5 Q Okay. I thought you alluded to the 2019 was
6 somehow retaliation? Did I hear you wrong?

7 A No. No. Future. Beyond 2019. He could
8 take -- he could hurt me financially as he did
9 in 2019, is my point.

10 Q Okay. So you're not saying he retaliated
11 against you in 2019 for the calculation error
12 that was corrected in 2018?

13 A That is correct. Yes.

14 Q You're saying that you understood you could have
15 complained, and you could have asked Ron for
16 more specific KSOs, but you were afraid that
17 Mr. Fowler would somehow retaliate against you?

18 A Yeah, that was a concern. Absolutely.

19 Q Okay. You understand that the reason why we
20 have complaint procedures and we say, There's no
21 retaliation; right? You understand that at
22 Roche?

23 A Sure.

24 Q They tell you, We give you all these complaint
25 procedures. They don't give you all the

EXHIBIT 1

CONFIDENTIAL, FILED UNDER SEAL

EXHIBIT 3

CONFIDENTIAL, FILED UNDER SEAL

EXHIBIT 5

CONFIDENTIAL, FILED UNDER SEAL

EXHIBIT 7

CONFIDENTIAL, FILED UNDER SEAL

EXHIBIT 9

CONFIDENTIAL, FILED UNDER SEAL

Run Date	SortBy_Dim	Payee ID	Name	Zone Territory	Active Territory	Paid Territory	Business Unit ID	Sales Team	Role ID	Payout Period	ACCEL - GROWTH	BAL PLAN ACCEL - ANNUAL	KSO	MBO	NEW HIRE PI OPEN TERRITORY	REV ACCEL - QUARTERLY Q	REVENUE - ANNUAL - PROFIT	REVENUE - TOTAL	SPIFF	Current Ne	GRAND TOTAL
1/30/2019 14:14	BOIK, CATHERINE	10039263	BOIK, CATHERINE	Null	GPO30	GPO30	CA	CA	CA-ND-GPO	2018-12 DEC				\$42,286.40			\$10,400.00			\$	\$2,686.40
1/30/2019 14:14	FEID, RICHARD	7415	FEID, RICHARD	Null	GPO20	GPO20	CA	CA	CA-ND-GPO	2018-12 DEC				\$42,556.80			\$10,400.00			\$	\$2,956.80
1/30/2019 14:14	JOHNSON, WHITNEY	30088	JOHNSON, WHITNEY	Null	GPO10	GPO10	CA	CA	CA-ND-GPO	2018-12 DEC				\$42,556.80			\$10,400.00			\$	\$2,956.80
1/30/2019 14:14	THOMSON, JOHN	1282	THOMSON, JOHN	Null	GPO40	GPO40	CA	CA	CA-ND-GPO	2018-12 DEC				\$40,726.40			\$10,400.00			\$	\$1,126.40

Run Date	SortBy_Dim	Payee ID	Name	Zone Territory	Active Territory	Paid Territory	Business Unit ID	Sales Team	Role ID	Payout Period	ACCEL - GRO BAL PLAN	ACCEL - ANNUAL	KSO	H1 KSO Score	H2 KSO Score	YTD KSO
1/30/2019 14:14	JOHNSON, WHITNEY	30088	JOHNSON, WHITNEY	Null	GPO10	GPO10	CA	CA	CA-ND-GPO	2018-12 DEC			\$42,556.80	100%	105%	\$ 42,556.80
1/30/2019 14:14	FEID, RICHARD	7415	FEID, RICHARD	Null	GPO20	GPO20	CA	CA	CA-ND-GPO	2018-12 DEC			\$42,556.80	100%	105%	\$ 42,556.80
1/30/2019 14:14	BOIK, CATHERINE	10039263	BOIK, CATHERINE	Null	GPO30	GPO30	CA	CA	CA-ND-GPO	2018-12 DEC			\$42,286.40	100%	103%	\$ 42,286.40
1/30/2019 14:14	THOMSON, JOHN	1282	THOMSON, JOHN	Null	GPO40	GPO40	CA	CA	CA-ND-GPO	2018-12 DEC			\$40,726.40	100%	96%	\$ 40,726.40

Run Date	SortBy_Dim	Payee ID	Name	Zone Territory	Active Territory	Paid Territory	Business Unit ID	Sales Team	Role ID	Payout Period	ACCEL - GROWT	BAL PLAN	ACCEL KSO	MBO	OPEN TERRITORY	PRIOR YEAR ADJUSTMENTS	REVENUE - ANNUJ	REVENUE - TOTAL	NEGATIVE	GRAND TOTAL
1/31/2020 16:26	Boilk, Catherine	10039263	Boilk, Catherine	Null	GPO30	GPO30	CA	CA	CA-ND-GPO	2019-12 DEC			\$44,720.00				\$8,450.00			\$53,170.00
1/31/2020 16:26	Feid, Richard	7415	Feid, Richard	Null	GPO20	GPO20	CA	CA	CA-ND-GPO	2019-12 DEC			\$41,600.00				\$8,450.00			\$48,220.00
1/31/2020 16:26	Johnson, Whitney	30088	Johnson, Whitney	Null	GPO10	GPO10	CA	CA	CA-ND-GPO	2019-12 DEC			\$42,224.00				\$8,450.00			\$50,674.00
1/31/2020 16:26	Thomson, John	1282	Thomson, John	Null	GPO40	GPO40	CA	CA	CA-ND-GPO	2019-12 DEC			\$37,648.00			\$1,040.00	\$8,450.00			\$47,138.00

Run Date	SortBy_Dir	Payee ID	Name	Zone	Territ	Active	Terr	Paid	Territ	Business	U	Sales	Team	Role	ID	Payout Period	Score
#####	Boik, Cath	10039263	Boik, Cath	Null		GPO30		GPO30		CA		CA		CA-ND-GPO		2019-06 JUN	100%
#####	Feid, Richa	7415	Feid, Richa	Null		GPO20		GPO20		CA		CA		CA-ND-GPO		2019-06 JUN	100%
#####	Johnson, V	30088	Johnson, V	Null		GPO10		GPO10		CA		CA		CA-ND-GPO		2019-06 JUN	100%
#####	Thomson, .	1282	Thomson, .	Null		GPO40		GPO40		CA		CA		CA-ND-GPO		2019-06 JUN	100%

Position	NCAD/NSSD	CAD/CAM	KSO or MBO	Score
CA-ND-GPO	Jason Fowler	Boik, Catherine	KSO CA-ND-GPO	115.0%
CA-ND-GPO	Jason Fowler	Johnson, Whitney	KSO CA-ND-GPO	102.5%
CA-ND-GPO	Jason Fowler	Feid, Richard	KSO CA-ND-GPO	100.0%
CA-ND-GPO	Jason Fowler	Thomson, John	KSO CA-ND-GPO	81.0%

Comp Plan	Territory	Payee	Payee Name	Period	Report Pulled Date	ACCEL - BAL PLAN	ACCEL - GROWTH	KSO	NEGATIVE BALANCE	NEW HIRE PLAN	OPEN TERRITORY	PRIOR BALANCE	PROFIT	REVENUE - COVID-19 - NATL - ANNUAL	REVENUE - TOTAL	Grand Total
CA-CAD-GPO	A10G01	0	No Employee	202112	1/21/2022 16:10	\$ -		\$ -						\$ 2,421.92	\$ 5,604.39	\$ 8,026.31
CA-CAD-GPO	A10G01	30088	Johnson, Whitney	202112	1/21/2022 16:10	\$ -		\$ 7,541.44						\$ 1,620.55	\$ 7,479.45	\$ 16,641.44
CA-CAD-GPO	A10G01	10110496	Patel, Sonal	202112	1/21/2022 16:10	\$ -		\$ 11,250.00						\$ 2,457.53	\$ 11,342.46	\$ 25,049.99
CA-CAD-GPO	A10G02	7415	Feid, Richard	202112	1/21/2022 16:10	\$ 35,000.00		\$ 35,400.00						\$ 6,500.00	\$ 30,000.00	\$ 106,900.00
CA-CAD-GPO	A10G03	10039263	Boik, Catherine	202112	1/21/2022 16:10	\$ 35,000.00		\$ 40,500.00						\$ 6,500.00	\$ 30,000.00	\$ 112,000.00
CA-CAD-GPO	A10G04	1282	Thomson, John	202112	1/21/2022 16:10	\$ -		\$ 30,000.00						\$ 6,500.00	\$ 30,000.00	\$ 66,500.00

Comp Plan	Component	Territory	Payee	Payee Name	Year-Qtr Period	Report Pulled Date	H1 Rating	H1 KSO Payout	H2 Rating	H2 KSO Payout	YTD KSO Payout
CA-CAD-GPO	KSO	A10G01	30088	Johnson, Whitney	2021-Q2 202106	1/14/2022 15:35	100%	\$ 7,541.44			\$ 7,541.44
CA-CAD-GPO	KSO	A10G01	1E+07	Patel, Sonal	2021-Q4 202112	1/14/2022 15:35	0%	\$ -	100.0%	\$11,250.00	\$11,250.00
CA-CAD-GPO	KSO	A10G02	7415	Feid, Richard	2021-Q4 202112	1/14/2022 15:35	120.0%	\$ 18,000.00	116.0%	\$17,400.00	\$35,400.00
CA-CAD-GPO	KSO	A10G03	1E+07	Boik, Catherine	2021-Q4 202112	1/14/2022 15:35	150.0%	\$ 22,500.00	120.0%	\$18,000.00	\$40,500.00
CA-CAD-GPO	KSO	A10G04	1282	Thomson, John	2021-Q4 202112	1/14/2022 15:35	100.0%	\$ 15,000.00	100.0%	\$15,000.00	\$30,000.00

Comp Plan	Component	Territory	Payee	Payee Name	Period	Report Pulled Date	Sum of Variance To Prior Qtr	Quota FY	Actual	Quota	Max. Attainment	TIP	Capped Rate	Capped Earnings	Uncapped Rate	Uncapped Earnings	Ytd Payout	Current Payout	
CA-CAD-GPO	REVENUE - COVID-19 - NATL - ANNUAL	A10G01	30088	Johnson, Whitney	2E+05	1/20/2022 11:06		0	1	1.02	1	1.02	0.249	1.3	\$6,500.00	1.3	\$6,500.00	\$1,620.55	\$1,620.55
CA-CAD-GPO	REVENUE - COVID-19 - NATL - ANNUAL	A10G01	0	No Employee	2E+05	1/20/2022 11:06		1.02	1	1.02	1	1.02	0.373	1.3	\$6,500.00	1.3	\$6,500.00	\$2,421.92	\$2,421.92
CA-CAD-GPO	REVENUE - COVID-19 - NATL - ANNUAL	A10G01	1E+07	Patel, Sonal	2E+05	1/20/2022 11:06		0	1	1.02	1	1.02	0.378	1.3	\$6,500.00	1.3	\$6,500.00	\$2,457.53	\$2,457.53
CA-CAD-GPO	REVENUE - TOTAL	A10G01	30088	Johnson, Whitney	2E+05	1/20/2022 11:06	255,281,397.75	#####	475,569,250.92	433,445,983.96	1.1	0.249	2	\$30,000.00	2	\$30,000.00	\$7,479.45	\$3,708.73	
CA-CAD-GPO	REVENUE - TOTAL	A10G01	1E+07	Patel, Sonal	2E+05	1/20/2022 11:06	127,793,757.43	#####	475,569,250.92	433,445,983.96	1.1	0.378	2	\$30,000.00	2	\$30,000.00	\$11,342.46	\$9,446.86	
CA-CAD-GPO	REVENUE - COVID-19 - NATL - ANNUAL	A10G02	7415	Feid, Richard	2E+05	1/20/2022 11:06		1.02	1	1.02	1	1.02	1	1.3	\$6,500.00	1.3	\$6,500.00	\$6,500.00	\$6,500.00
CA-CAD-GPO	REVENUE - TOTAL	A10G02	7415	Feid, Richard	2E+05	1/20/2022 11:06	127,793,757.43	#####	475,569,250.92	433,445,983.96	1.1	1	2	\$30,000.00	2	\$30,000.00	\$30,000.00	\$18,750.00	
CA-CAD-GPO	REVENUE - COVID-19 - NATL - ANNUAL	A10G03	1E+07	Boik, Catherine	2E+05	1/20/2022 11:06		1.02	1	1.02	1	1.02	1	1.3	\$6,500.00	1.3	\$6,500.00	\$6,500.00	\$6,500.00
CA-CAD-GPO	REVENUE - TOTAL	A10G03	1E+07	Boik, Catherine	2E+05	1/20/2022 11:06	127,793,757.43	#####	475,569,250.92	433,445,983.96	1.1	1	2	\$30,000.00	2	\$30,000.00	\$30,000.00	\$18,750.00	
CA-CAD-GPO	REVENUE - COVID-19 - NATL - ANNUAL	A10G04	1282	Thomson, John	2E+05	1/20/2022 11:06		1.02	1	1.02	1	1.02	1	1.3	\$6,500.00	1.3	\$6,500.00	\$6,500.00	\$6,500.00
CA-CAD-GPO	REVENUE - TOTAL	A10G04	1282	Thomson, John	2E+05	1/20/2022 11:06	127,793,757.43	#####	475,569,250.92	433,445,983.96	1.1	1	2	\$30,000.00	2	\$30,000.00	\$30,000.00	\$18,750.00	

TIP=Time in Position

Covid Revenue was raised to 102% for all employees as forecasting such a large number was difficult to predict

Comp Plan	Territory	Payee	Payee Name	Period	Report Pulled Date	ACCEL - BAL PLAN	ACCEL - GROWTH	NEW HIRE PLAN	Total
CA-CAD-GPO	A10G02	7415	Feid, Richard	202112	1/21/2022 15:35	\$ 35,000.00			\$ 35,000.00
CA-CAD-GPO	A10G03	10039263	Boik, Catherine	202112	1/21/2022 15:35	\$ 35,000.00			\$ 35,000.00